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October 31, 2016

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TWA325
Washington, DC 20554

**Re: Post-Incentive Auction Transition Scheduling Plan, DA 16-1095;
Docket No. 16-306; GN Docket No. 12-268**

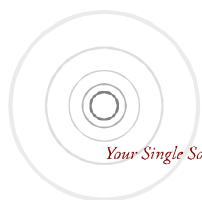
Dear Ms. Dortch:

Electronics Research, Inc. ("ERI") supports the proposed post-incentive auction transition scheduling plan (the "Transition Plan") that the Federal Communications Commission's Incentive Auction Task Force and Media Bureau have proposed. The Transition Plan relies on reasonable assumptions regarding the availability of the necessary resources. Like many other service and equipment providers, ERI has prepared to meet increased demand during the transition period. Adoption of the Transition Plan will allow ERI to work with other vendors to conduct a smooth, orderly and timely post-auction transition process.

ERI recognizes the value of assigning each relocating station to one of ten (10) "transition phases". We appreciate the Commission developing the Phase Assignment Tool and the Phase Scheduling Tool to identify construction deadlines for stations. These tools promise to identify not only the constraints created by the assignment relationships between stations but also recognize the variety of unique factors that apply to each facility's transition to a new operating channel and the resources available to the industry to accomplish the channel repacking plan.

ERI has invested substantially in the expansion of its capacity to produce the antennas, transmission line products, and filter systems that will be required by the Transition Plan. We have increased the number of skilled people we employ by 50% and plan to reach our hiring goal of doubling our total workforce, as announced last April, early in the first calendar quarter of 2017. ERI is in the process of more than doubling the manufacturing and tuning space for television antenna fabrication and testing. These buildings are nearly complete and they will be fully equipped and operational before the end of this year. In addition to ERI's expansion of the engineering and manufacturing capacity for television antennas and related products ERI has increased the number of installation crews on our staff from two to three. We are presently in the process of adding a fourth crew. All ERI's crews are trained and equipped for the installation of large television antennas at tower heights of 1,000 feet and higher. In addition to adding the personnel and, just as importantly, the equipment they required. ERI is also investing in two complete sets of high capacity winches and gin poles that will be made available for lease to other qualified tower crews.

The Commission's transition plan, including the tools to be created to schedule and implement it, the investments being made by ERI to prepare for the television repack, and the existing capacity provided by other suppliers should make it possible to complete the process within the 39 months allotted, if all goes according to plan.



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ERI would suggest that in addition to the actions already taken and those planned that the Commission give serious consideration to:

1. Doing all that it can to encourage television stations to place orders for equipment as early as possible. This will allow equipment suppliers and installation crews to prioritize projects based on phase assignments and construction permit deadlines instead of basing production priorities on a first come/first served basis. If all the stations in a market or region have timely orders in process, even with different vendors, those equipment orders can be coordinated to optimize the efficiency of installation activities.
2. We ask that the Commission consider revisiting its prohibition on communications with potential third party conduits of information. This has placed a muzzle on broadcasters, preventing them from reaching out to vendors and other service providers to begin making plans, gather pricing information, conduct preliminary analysis of current facilities and equipment, and other activities that would make the Post Auction transition and the repacking of the television band a more organized and swiftly executed process.

Based on our experience, ERI is comfortable that the Transition Plan provides a sufficient framework for vendors and suppliers to satisfy the need to transition television stations to new operating channels following the close of the incentive auction. ERI supports the Transition Plan and welcomes the opportunity to assist television licensees to maintain and enhance free, over-the-air television services for the viewing public.

Respectfully submitted,



Bill Harland
Vice President of Marketing
Electronics Research, Inc.

